

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 58 through 73, 78, and 83 are pending, with Claims 58, 63, and 68 being independent. Claims 74 through 77, 79 through 82, and 84 through 87 have been cancelled without prejudice. Claims 58 through 61, 63 through 66, 68 through 71, 73, 78, and 83 have been amended.

Claims 58, 63, 68, 73, 78, and 83 are objected to on the grounds that “the same operation” should read --a same operation--, which objection has been obviated by the amendment of the claims as kindly suggested in the Official Action.

Claims 58 through 87 were variously rejected under 35 U.S.C. §§ 102 and 103 over Cortjens, et al., taken alone or in combination with previously-cited U.S. Patent No. 6,313,875 B1 (Suga, et al.). All rejections are respectfully traversed.

Claims 58, 63, and 68 recite, *inter alia*, in response to continuous designations including a predetermined plurality of commands for a same operation, controlling the video camera in accordance with at least one but not all of the predetermined plurality of commands, and in response to continuous designations not including a predetermined plurality of commands for the same operation, controlling the video camera in accordance with each of the predetermined plurality of commands.

However, Applicant respectfully submits that neither Cortjens, et al. nor Suga, et al., even in the proposed combination, assuming, *arguendo*, that such could be combined, discloses or suggests at least the above-discussed claimed features as recited, *inter alia*, in Claims 58, 63, and 68.

With respect to Cortjens, et al., the Official Action's position appears to be that if two panning commands, each representing amounts not greater than the resolution error, are sent, then the camera will not be operated in accordance with those commands, and that such constitutes disclosure of not controlling the camera in accordance with each of a plurality of commands. However, Applicant respectfully submits that such an argument appears to rely upon the doctrine of inherency, and to rely upon that doctrine, the cited document must invariably and necessarily contain the claimed features, which is not the case, because if two panning commands which are greater than the resolution error were received in Cortjens, et al., they would both be performed.

Applicant further respectfully submits that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

Claims 58 through 87 were rejected under the judicially-created doctrine of non-statutory obviousness-type double patenting over Claims 1, 2, and 5 through 16 of parent U.S. Patent No. 6,611,285 B1 in view of newly-cited U.S. Patent No. 5,598,209 (Cortjens, et al.). All rejections are respectfully traversed. The Official Action states that the parent patent claims lack a feature and therefore relies upon Cortjens, et al.. However, Applicant respectfully submits that there has been no showing of any indication of motivation that would lead one having ordinary skill in the art to attempt to effect such a combination, assuming, *arguendo*, that such could be combined.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Daniel S. Glueck/
Daniel S. Glueck
Attorney for Applicant
Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200

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